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Subject
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action – Former Plainwell Impoundment
Monthly Report (October 2007)

INDUSTRIAL

Dear Michael:

Attached is the eighth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action. This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS of New York, Inc.

Stephen Garbaciak Jr , P E
Principal Engineer/Vice President

Date
November 15, 2007

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MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE TIME-CRITICAL REMOVAL ACTION (TCRA) – FORMER PLAINWELL IMPOUNDMENT

REPORT #8, OCTOBER 2007

PREPARED BY ARCADIS BBL
NOVEMBER 15, 2007

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

MICHAEL RIBORDY, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Monthly Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment

REPORT #8, OCTOBER 2007

Significant Developments and Activities During the Period

- On October 1, the Kalamazoo River Study Group (KRSG) submitted a copy of the *20th Weekly Construction Report for the Plainwell TCRA* to the United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ).

- On October 2, the KRSG received copies of analytical data from split samples collected by the USEPA during TCRA activities.

- On October 3, the KRSG submitted a copy of the agenda for the upcoming Stakeholders Meeting to USEPA, MDEQ, the United States Fish and Wildlife Service (USFWS) and the Michigan Department of Natural Resources (MDNR).

- On October 3, the KRSG submitted a copy of the *21sr Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On October 3, MDNR transmitted an electronic copy of a list of contacts regarding river closure to the KRSG.

- On October 8, the KRSG submitted a letter, via email, to USEPA and MDEQ describing the hydraulic fluid release that occurred during TCRA work activities on October 2.

- On October 9, the KRSG submitted a copy of the *22nd Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On October 15, the KRSG submitted the seventh *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for September 2007 to USEPA

- On October 16, the KRSG submitted a copy of the *23rd Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On October 22, USEPA submitted a letter to the KRSG regarding the transfer of On-Scene Coordinator duties from Sam Borries to Michael Ribordy.

- On October 23, a Stakeholders Meeting was held onsite between USEPA, MDEQ, MDNR and the KRSG.

- On October 23, the KRSG submitted a copy of the *24th Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On October 25, the KRSG submitted the final *Multi-Area Field Sampling Plan* to USEPA.

- On October 26, USEPA electronically submitted to the KRSG and MDEQ a proposal regarding a Kalamazoo citizens advisory group

- On October 29, the KRSG submitted verbal notification to MDEQ and USEPA of the water discharge noncompliance that occurred at the Plainwell dam water treatment facility on October 26. The MDEQ and USEPA received written notification electronically on October 31, and are scheduled to receive a hard copy on November 1.

- On October 29, USEPA issued a Press Release titled *Informational Open Houses on Kalamazoo River Cleanup November 7.*

- On October 30, the KRSG submitted a copy of the *25th Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On October 31, MDNR submitted to the KRSG, via email, a draft copy of a public flier regarding post-excavation work on the river banks at the conclusion of TCRA activities.

- On October 3, 11, 18, 24 and 31, the KRSG submitted copies of analytical data from TCRA sampling activities to USEPA.

- By October 31, the KRSG had obtained property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A), from ten property owners.

- In October, USEPA issued a Fact Sheet titled *Plainwell PCB Cleanup Progress and Updates.* The KRSG is scheduled to receive a hard copy on November 2.

Data Collected and Field Activities Conducted During the Period

- During the week of October 1, the KRSG commenced excavation at Upland Area 6B1; continued seeding and placement of erosion control mats in Removal Areas 3B and 4B; installed topsoil in Removal Area 6B; started dewatering behind the Phase 1 Cofferdam; continued removing Staging Area 2S; and completed construction of Staging Area 3S. Two surface water samples (K30661 and K30662) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 6B for PCB analysis. A rinse blank (K30663) was also collected. Composite soil sample K25739 was collected from Staging Area 2S. This sample was collected from the same location as sample K25727 (collected in July 2007) to show that the PCB concentration in the soil in this area had not increased during TCRA activities During installation of the system, PCB wipe samples were collected from the five holding tanks (Tank 1 through Tank 5) associated with the 500 gallon per minute (GPM) water treatment facility. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- During the week of October 8, the KRSG completed excavation work at Upland Area 6B1; started excavation at the Phase 1 Cofferdam Area, continued dewatering of the Phase 1 Cofferdam Area; continued installation of the water control structure; completed removal of Staging Area 2S; started construction of Staging Area 5S; continued seeding and placement of erosion control mats in Removal Areas 4B and 6B; and started post-construction activities in Upland Area 6B1. Seven sediment confirmation samples (K55317 through K55323) were collected from Upland Area 6B1. Two surface water samples (K30664 and K30665) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 7 for PCB analysis. A rinse blank (K30666) was also collected Soil samples K25740 through K25750 were collected from the access roads located around Staging Area 2S. These samples were collected from the exact same locations as samples K25715 through K25717 and K25719 through K25726 (collected in July 2007) to show that the PCB concentration in the soil in these areas had not increased during TCRA activities. Wastewater samples W_CDA1_Influ_0001, W_CDA1_Mid_0001 and W_CDA1_Efflu_0001 were collected from the influent port, the midpoint port and the effluent port of the 500 GPM water treatment system, respectively, located near the Plainwell Dam. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- During the week of October 15, the KRSG continued excavation at the Phase 1 Cofferdam Area; continued installation of the water control structure, completed construction of Staging Area 5S, continued dewatering of the Phase 1 Cofferdam Area; and continued post-excavation work at Upland Area 6B1. Two sediment samples (K55324 and K55325) were collected from Upland Area 6B1. The USEPA collected a split sample of K55325 (APS-101507-09-SD/K55325). Two surface water samples (K30667 and K30668) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 7 for PCB analysis. A rinse blank (K30669) was also collected. Wastewater samples W_CDA1_Influ_0002, W_CDA1_Mid_0002 and W_CDA1_Efflu_0002 were collected from the influent port, the midpoint port and the effluent port of the 500 GPM water treatment system, respectively, located near the Plainwell Dam. Prior to discharge, wastewater samples W_SA3S_Influ_0001, W_SA3S_Influ_0002 and W_SA3S_Influ_0003 (influent port), W_SA3S_MidA_0001, W_SA3S_MidA_0002 and W_SA3S_MidA_0003 (midpoint port, right side), W_SA3S_MidB_0001, W_SA3S_MidB_0002 and W_SA3S_MidB_0003 (midpoint port, left side), W_SA3S_EffluA_0001, W_SA3S_EffluA_0002 and W_SA3S_EffluA_0003 (effluent port, right side) and W_SA3S_EffluB_0001, W_SA3S_EffluB_0002 and W_SA3S_EffluB_0003 (effluent port, left side) were collected from the water treatment system located at Staging Area 3S. A duplicate of sample W_SA3S_MidA_0002 (W_SA3S_Dup_0001) was also collected from the right midpoint port. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal

- During the week of October 22, the KRSG continued excavation at the Phase 1 Cofferdam Area; commenced excavation of Removal Area 7; continued installation of the water control structure; continued dewatering of the Phase 1 Cofferdam Area; and completed post-construction activities in Upland Area 6B1. Two surface water samples (K30670 and K30671) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 7 for PCB analysis. A

rinse blank (K30672) and a duplicate of sample K30671 (K30673) were also collected One soil sample (K25751) was collected from the Consumers Energy parcel located near the Plainwell Dam to establish a baseline PCB concentration in the soil prior to TCRA activities. Wastewater samples W_CDA1_Influ_0003, W_CDA1_Mid_0003 and W_CDA1_Efflu_0003 were collected from the influent port, the midpoint port and the effluent port of the 500 GPM water treatment system, respectively, located near the Plainwell Dam. Prior to discharge, wastewater samples W_SA3S_Influ_0004 (influent port), W_SA3S_MidA_0004 (midpoint port, right side), W_SA3S_MidB_0004 (midpoint port, left side), W_SA3S_EffluA_0004 (effluent port, right side) and W_SA3S_EffluB_0004 (effluent port, left side) were collected from the water treatment system located at Staging Area 3S. Table B summarizes the samples collected Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- During the week of October 29, the KRSG continued excavation at the Phase 1 Cofferdam Area; continued excavation of Removal Area 7; continued installation of the water control structure; continued dewatering of the Phase 1 Cofferdam Area; and made modifications to the 500 GPM water treatment facility located near the Phase 1 Cofferdam Area. Prior to discharge, wastewater samples W_SA3S_Influ_0005 (influent port), W_SA3S_MidA_0005 (midpoint port, right side), W_SA3S_MidB_0005 (midpoint port, left side), W_SA3S_EffluA_0005 (effluent port, right side), W_SA3S_EffluB_0005 (effluent port, left side) were collected from the water treatment system located at Staging Area 3S. A duplicate of sample W_SA3S_MidB_0005 (W_SA3S_Dup_0002) was also collected from the left midpoint port. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- As of October 31, approximately 24,000 cubic yards of material has been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, the Phase 1 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1 and 6B1, and Islands 1, 2, and 3

Laboratory Data Received During the Period

- During the week of October 1, the KRSG received analytical data for soil sample K25739 and surface water samples K30655 through K30657 (collected in September).

- During the week of October 8, the KRSG received analytical data for soil samples K25740 through K25750, sediment confirmation samples K55317 through K55323, surface water samples K30658 through K30660 (collected in September), PCB wipe samples Tank 1 through Tank 5, and waste water samples W_CDA1_Influ_0001, W_CDA1_Mid_0001 and W_CDA1_Efflu_0001.

- During the week of October 15, the KRSG received analytical data for sediment confirmation samples K55324, K55325 and USEPA split sample APS-101507-09-SD/K55325, surface water samples K30661 through K30666, and waste water samples W_CDA1_Influ_0002, W_CDA1_Mid_0002, W_CDA1_Efflu_0002, W_SA3S_Influ_0001, W_SA3S_Influ_0002, W_SA3S_Influ_0003, W_SA3S_MidA_0001, W_SA3S_MidA_0002, W_SA3S_MidA_0003, W_SA3S_MidB_0001,

W_SA3S_MidB_0002, W_SA3S_MidB_0003, W_SA3S_EffluA_0001, W_SA3S_EffluA_0002, W_SA3S_EffluA_0003, W_SA3S_EffluB_0001, W_SA3S_EffluB_0002, W_SA3S_EffluB_0003 and W_SA3S_Dup_0001

- During the week of October 22, the KRSG received analytical data for waste water samples W_CDA1_Influ_0003, W_CDA1_Mid_0003, W_CDA1_Efflu_0003, W_SA3S_Influ_0004, W_SA3S_MidA_0004, W_SA3S_MidB_0004, W_SA3S_EffluA_0004 and W_SA3S_EffluB_0004

- During the week of October 29, the KRSG received analytical data from surface water samples K30667 through K30669 and waste water samples W_SA3S_Influ_0005, W_SA3S_MidA_0005, W_SA3S_MidB_0005, W_SA3S_EffluA_0005, W_SA3S_EffluB_0005 and W_SA3S_Dup_0002.

- The KRSG is awaiting analytical results for surface water samples K30670 through K30673 and soil sample K25751

Issues Encountered and Actions Taken

- During the week of October 1, the project team identified subsurface rock and concrete at the Plainwell Dam affecting the installation of steel sheeting for the water control structure Pre-trenching of the water control structure's alignment was necessary to reduce the impact of subsurface obstructions to steel sheeting installation. During the week of October 29, the final H-pile of the water control structure could not be driven to its design depth due to an obstruction. Additional cross-bracing will be used to support this H-pile.

- During the week of October 1, dewatering of the west channel of the Plainwell Dam commenced Initial dewatering activities indicated that the recharge rate in the area may exceed the capability to dewater. A sump was installed to dewater the area instead of a suction pump. This design change increased the capacity to dewater the Phase 1 Cofferdam Area.

- On October 2, contractor for the MDEQ collected a surface water sample from the backwater area within the Phase 1 Cofferdam Area. The depth of water was not measured prior to collecting the sample. The sample was collected by moving a 1-liter amber bottle attached to a stick vertically through the water from bottom to surface According to the MDEQ, the sample, PSW-CDA1-01-1, serves as a background sample. The sample location was surveyed by KRSG field personnel.

- On October 2, a hydraulic line break occurred on an impact hammer attachment on a crane that was installing steel sheeting for the water control structure at the Plainwell Dam. As a result of the hydraulic line break, an estimated two quarts of hydraulic fluid spilled into the water in the vicinity of the Plainwell Dam. The area where the spill occurred was completely contained by an earthen berm that was constructed to facilitate dewatering activities. No hydraulic fluid was released into the main river channel. After immediately shutting down operations, the project team deployed absorbent pads and absorbent booms to capture the spilled material and notified USEPA, MDEQ and the National Response Center. The hydraulic line was repaired and all of the equipment lines and connections on

the cranes were inspected prior to resuming work activities. A letter documenting the release and response measures was submitted to USEPA and MDEQ on October 8

- On October 26, a total suspended solid (TSS) concentration of 53 milligrams/liter (mg/L) was detected in the effluent sample of the 500 GPM water treatment system located near the Plainwell Dam. This concentration exceeded the daily discharge limit (45 mg/L) as specified in the Substantive Requirements Document (SRD). The MDEQ was verbally notified of the non-compliance on October 29 and a written report was submitted October 31. The water treatment system was shut down on October 30 and will not resume operation until the TSS concentration is controlled. This will be accomplished by using finer-grain sand in the sand filter, using smaller pore-size bag filters and relocating two of the four bank filters to the output side of the carbon filters The treatment system is scheduled to be activated during the week of November 5.

- At several times during the month, the C&C Landfill stopped accepting material due to processing and capacity issues. The KRSG is researching options to address this situation.

Developments Anticipated During the Next Reporting Period

- During the week of November 1, the KRSG will continue excavating soil and sediment at the Phase 1 Cofferdam Area and Removal Area 7; continue processing, transportation and disposal of soil and sediment at the C&C Landfill, continue installation of the water control structure (beams, bracing, and decking); continue dewatering at the Phase 1 Cofferdam Area; and continue post-construction activities along the south bank of the river.

- During the week of November 5, the KRSG will complete excavating soil and sediment from the Phase 1 Cofferdam Area and will continue to excavate soil from Removal Area 7; continue processing, transportation and disposal of soil and sediment at the C&C Landfill; continue installation of the water control structure (beams, bracing, and decking); continue dewatering at the Phase 1 Cofferdam Area, and continue post-construction activities along the south bank of the river.

- During the week of November 12, the KRSG will complete the excavation of soil from Removal Area 7 and begin excavating embankment material in and around the Plainwell Dam, continue processing, transportation and disposal of soil and sediment at the C&C Landfill; continue installing the water control structure (bracing and decking); continue dewatering at the Phase 1 Cofferdam Area; and continue post-construction activities along the south bank of the river

- During the week of November 19, the KRSG will continue excavating embankment material in and around the Plainwell Dam, continue processing, transportation and disposal of soil and sediment at the C&C Landfill; continue installation of the water control structure (stairs, railings, and hoists), continue dewatering at the Phase 1 Cofferdam Area, and continue post-construction activities along the south bank of the river.

- During the week of November 26, the KRSG will continue excavating embankment material in and around the Plainwell Dam, begin excavating soil and sediment at Removal Area 8B (weather permitting), continue processing, transportation and disposal of soil and sediment at the C&C Landfill; complete installation of the water control structure (concrete and stop logs); continue dewatering at the Phase 1 Cofferdam Area; and continue post-construction activities along the south bank of the river.

- Throughout November, the KRSG will continue to negotiate property access agreements as required by Paragraph 23 of the TCRA AOC (Table A).

- Throughout November, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA AOC.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #8, October 2007

Table A — Summary of Property Access Agreements (as of October 31, 2007)

Date Sent	Property Owner	Status
3/19/2007	A C Geenen Associates	NA
3/9/2007	Aggregate Industries (Bill Smith Sand and Gravel)	accepted
3/9/2007	Allen Robinson	accepted
3/9/2007	Balkema Excavating	accepted, amended 9/26/07
3/9/2007	Brad Keeler	accepted
3/9/2007	City of Plainwell	accepted
3/26/2007	Consumers Energy	accepted
3/9/2007	Meijer, Inc.	accepted
3/21/2007	Plainwell Group LLC	no response
3/16/2007	Robert Foster Trust	rejected
3/9/2007	Robert Keeler Trust	accepted
3/9/2007	Rolfe Family Trust	accepted, extended 10/10/07
3/16/2007	Shirley Foster	NA
3/9/2007	Steven Peterson	accepted

Note
NA = Not applicable, changes to original design have eliminated the need to access this property.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #8, October 2007

Table B — Summary of Samples Collected and Data Received in October 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Soil Samples									
K25739	10/4/2007	10/5/2007	074146	KAR Labs	*Post-construction sample from Staging Area 2S (same as K25727)*	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25740	10/10/07	10/11/07	074228	KAR Labs	Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25716)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25741					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25717)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25742					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25719)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25743					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25720)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25744					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25721)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25745					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25722)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25746					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25723)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25747					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25724)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25748					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25725)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25749					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25726)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25750					Post-construction sample collected from access roads around Staging Area 2S, on City of Plainwell property (same as K25715)	PCBs	< 0 33 mg/kg	< 0 33 [2] mg/kg	None
K25751	10/24/07	NR	-	KAR Labs	Circular Consumers Energy property located near the Plainwell Dam	PCBs	NR	-	-

See Notes on Page 6

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #8, October 2007

Table B — Summary of Samples Collected and Data Received in October 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Sediment Confirmation Samples									
K55317	10/09/07	10/10/2007	074209	KAR Labs	Upland Area 6B1, Grid 9	PCBs	< 0 33 mg/kg	5 mg/kg	None
K55318					Upland Area 6B1, Grid 8	PCBs	2 4 mg/kg	5 mg/kg	None
K55319					Upland Area 6B1, Grid 7	PCBs	3 4 mg/kg	5 mg/kg	None
K55320					Upland Area 6B1, Grid 6	PCBs	2 2 mg/kg	5 mg/kg	None
K55321					Upland Area 6B1, Grid 5	PCBs	< 0 33 mg/kg	5 mg/kg	None
K55322	10/11/07	10/12/2007	074237	KAR Labs	Upland Area 6B1, Grid 4	PCBs	0 73 mg/kg	5 mg/kg	None
K55323					Upland Area 6B1, Grid 3	PCBs	<0 33 mg/kg	5 mg/kg	None
K55324	10/15/07	10/16/2007	074295	KAR Labs	Upland Area 6B1, Grid 1	PCBs	0 1 mg/kg	5 mg/kg	None
K55325 [1]					Upland Area 6B1, Grid 2	PCBs	< 0 06 mg/kg	5 mg/kg	None
[K55325] APS-101507-09-SD/K55325			***710338***	***TriMarix Laboratories***			***0.056 mg/kg***	***5 mg/kg***	***None***
Surface Water Samples									
K30655	09/20/07	10/03/07	073932	KAR Labs	300' downstream RA 6B	PCBs	0 2 µg/L	-	None
K30656				KAR Labs	100' upstream RA 6B	PCBs	< 0 1 µg/L	-	None
K30657				KAR Labs	Rinse Blank	PCBs	< 0 1 µg/L	-	None
K30658	09/27/07	10/08/07	074024	KAR Labs	300' downstream RA 6B	PCBs	< 0 1 µg/L	-	None
K30659				KAR Labs	100' upstream RA 6B	PCBs	< 0 1 µg/L	-	None
K30660				KAR Labs	Rinse Blank	PCBs	< 0 1 µg/L	-	None
K30661	10/04/07	10/16/07	074142	KAR Labs	300' downstream RA 6B	PCBs	< 0 1 µg/L	-	None
K30662				KAR Labs	100' upstream RA 6B	PCBs	< 0 1 µg/L	-	None
K30663				KAR Labs	Rinse Blank	PCBs	< 0 1 µg/L	-	None
K30664	10/11/07	10/19/07	074275	KAR Labs	300' downstream RA 7	PCBs	< 0 1 µg/L	-	None
K30665				KAR Labs	100' upstream RA 7	PCBs	< 0 1 µg/L	-	None
K30666				KAR Labs	Rinse Blank	PCBs	< 0 1 µg/L	-	None
K30667	10/18/07	10/31/07	074353	KAR Labs	300' downstream RA 7	PCBs	< 0 1 µg/L	-	None
K30668				KAR Labs	100' upstream RA 7	PCBs	< 0 1 µg/L	-	None
K30669				KAR Labs	Rinse Blank	PCBs	< 0 1 µg/L	-	None
K30670	10/25/07	NR	-	KAR Labs	300' downstream RA 7	PCBs	NR	-	-
K30671				KAR Labs	100' upstream RA 7	PCBs		-	
[K30673]				KAR Labs		[PCBs]		-	
K30672				KAR Labs	Rinse Blank	PCBs		-	

See Notes on Page 6

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #8, October 2007

Table B — Summary of Samples Collected and Data Received in October 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Waste Water Samples									
W_CDA1_Influ_0001	10/10/07	10/11/2007	074226	KAR Labs	500 GPM Water Treatment Facility, influent sample	PCBs	< 0 1 µg/L	-	None
W_CDA1_Mid_0001				KAR Labs	500 GPM Water Treatment Facility, midpoint sample	PCBs	< 0 1 µg/L	-	None
W_CDA1_Efflu_0001			074238	KAR Labs	500 GPM Water Treatment Facility, effluent sample	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P = 0 06 mg/L, No Action Limit
W_SA3S_Influ_0001	10/15/07	10/16/2007	074296	KAR Labs	Staging Area 3S, Discharge 1, influent sample	PCBs	< 0 1 µg/L	-	None
W_SA3S_MidA_0001				KAR Labs	Staging Area 3S, Discharge 1, mid point sample, right side	PCBs	< 0 1 µg/L	-	None
W_SA3S_EffluA_0001			074300	KAR Labs	Staging Area 3S, Discharge 1, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0001			074296	KAR Labs	Staging Area 3S, Discharge 1, mid point sample, left side	PCBs	< 0 1 µg/L	-	None
W_SA3S_EffluB_0001			074300	KAR Labs	Staging Area 3S, Discharge 1, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0002	10/16/07	10/18/2007	074323	KAR Labs	Staging Area 3S, Discharge 2, influent sample	PCBs	0 1 µg/L	-	None
W_SA3S_MidA_0002				KAR Labs	Staging Area 3S, Discharge 2, mid point sample, right side	PCBs	< 0 1 µg/L	-	None
[W_SA3S_Dup_0001]				KAR Labs		[PCBs]	[< 0 1 µg/L]	-	[None]
W_SA3S_EffluA_0002				KAR Labs	Staging Area 3S, Discharge 2, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0002				KAR Labs	Staging Area 3S, Discharge 2, mid point sample, left side	PCBs	< 0 1 µg/L	-	None
W_SA3S_EffluB_0002				KAR Labs	Staging Area 3S, Discharge 2, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L

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Table B — Summary of Samples Collected and Data Received in October 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
W_CDA1_Influ_0002	10/17/07	10/18/2007	074238	KAR Labs	500 GPM Water Treatment Facility, influent sample	PCBs	< 0 1 µg/L	-	None
W_CDA1_Mid_0002				KAR Labs	500 GPM Water Treatment Facility, midpoint sample	PCBs	< 0 1 µg/L	-	None
W_CDA1_Efflu_0002		10/19/2007	074351	KAR Labs	500 GPM Water Treatment Facility, effluent sample	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = 41 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0003	10/18/07	10/19/2007		KAR Labs	Staging Area 3S, Discharge 3, influent sample	PCBs	0 17 µg/L	-	None
W_SA3S_MidA_0003				KAR Labs	Staging Area 3S, Discharge 3, mid point sample, right side	PCBs	0 2 µg/L	-	None
W_SA3S_EffluA_0003			074364	KAR Labs	Staging Area 3S, Discharge 3, effluent sample, right side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None
W_SA3S_MidB_0003			074351	KAR Labs	Staging Area 3S, Discharge 3, mid point sample, left side	PCBs	0 2 µg/L	-	
W_SA3S_EffluB_0003			074364	KAR Labs	Staging Area 3S, Discharge 3, effluent sample, left side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P = 0 05 mg/L, No Action Limit
W_SA3S_Influ_0004	10/23/07	10/24/2007	074406	KAR Labs	Staging Area 3S, Discharge 4, influent sample	PCBs	< 0 1 µg/L	-	None
W_SA3S_MidA_0004				KAR Labs	Staging Area 3S, Discharge 4, mid point sample, right side	PCBs	< 0 1 µg/L	-	None
W_SA3S_EffluA_0004		10/25/2007	074414	KAR Labs	Staging Area 3S, Discharge 4, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0004		10/24/2007	074406	KAR Labs	Staging Area 3S, Discharge 4, mid point sample, left side	PCBs	< 0 1 µg/L	-	None
W_SA3S_EffluB_0004		10/25/2007	074414	KAR Labs	Staging Area 3S, Discharge 4, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L

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Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
W_CDA1_Influ_0003	10/25/07	10/26/2007	074428	KAR Labs	500 GPM Water Treatment Facility, influent sample	PCBs	0 2 µg/L	-	None
W_CDA1_Mid_0003				KAR Labs	500 GPM Water Treatment Facility, midpoint sample	PCBs	0 5 µg/L	-	None
W_CDA1_Efflu_0003				KAR Labs	500 GPM Water Treatment Facility, effluent sample	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	Yes TSS = 53 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0005	10/29/07	10/31/2007	074492	KAR Labs	Staging Area 3S, Discharge 5, influent sample	PCBs	< 0 1 µg/L	-	None
W_SA3S_MidA_0005				KAR Labs	Staging Area 3S, Discharge 5, mid point sample, right side	PCBs	< 0 1 µg/L	-	None
W_SA3S_EffluA_0005				KAR Labs	Staging Area 3S, Discharge 5, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0005 [W_SA3S_Dup_0002]				KAR Labs	Staging Area 3S, Discharge 5, mid point sample, left side	PCBs [PCBs]	< 0 1 µg/L [< 0 1 µg/L]	- -	None [None]
W_SA3S_EffluB_0005				KAR Labs	Staging Area 3S, Discharge 5, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
Wipe Samples									
Tank 1	10/05/07	10/8/2007	074169	KAR Labs	500 GPM treatment system Tank 1	PCBs	< 0 1 µg/ 100 sq cm	-	None
Tank 2				KAR Labs	500 GPM treatment system Tank 2	PCBs	< 0 1 µg/ 100 sq cm	-	None
Tank 3				KAR Labs	500 GPM treatment system Tank 3	PCBs	< 0 1 µg/ 100 sq cm	-	None
Tank 4				KAR Labs	500 GPM treatment system Tank 4	PCBs	< 0 1 µg/ 100 sq cm	-	None
Tank 5				KAR Labs	500 GPM treatment system Tank 5	PCBs	< 0 1 µg/ 100 sq cm	-	None

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Table B — Summary of Samples Collected and Data Received in October 2007

Notes

1 - Split sample collected by USEPA
2 - PCB concentration of pre-construction sample
TAL - TestAmerica Laboratories
NR - Analytical results not yet received
RA - Removal Area
TCL - Target Compound List
TSS - Total Suspended Solids
P - Phosphorus
TPH - Total Petroleum Hydrocarbons

VOCs - Volatile Organic Compounds
SVOCs - Semi-Volatile Organic Compounds
RCRA - Resource Conservation and Recovery Act
GPM - Gallons Per Minute
mg/kg - milligrams per kilogram
µg/L - micrograms per liter
* Duplicate samples are shown in brackets
* USEPA split samples are shown in bold and in brackets USEPA split sample IDs are shown in bold and italicized font
* Label 'A' denotes non-TSCA material sampled from within a grid and label 'B' denotes TSCA material sampled from within a grid area

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